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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY



November 25, 1998

Magalie Roman Salas
Office of the Secretary
Federal Communications Committee
1919 M Avenue, NW, Room 222
Washington, DC 20554

Dear Madam Secretary,

The following is the response of the Board of Directors, Quarter Century Wireless Association, to the Notice of Proposed Rule Making WT Docket No. 98-143, RM-9148, RM-9150 and RM-9196 released August 10, 1998.

We are pleased that the Commission has initiated this exhaustive review of amateur service regulations and now seeks public comment on the proposed revisions. We also recognize the earlier recommendations of the American Radio Relay League for streamlining licensing procedures, although we have reservations about some of the ARRL proposals.

The Quarter Century Wireless Association has almost ten thousand active members who were first licensed twenty-five or more years ago and currently hold amateur licenses. A large number of our members are or have been directly involved in the development and demonstration of amateur radio as a service to the government and to the public at large. Within our membership are some of the most experienced, knowledgeable and technically proficient amateurs in the country. QCWA members hold licenses ranging from Novice to Extra Class and many have utilized all approved modes of communication available to amateurs.

Our comments and recommendations on Docket No. 98-143 follow.

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A. Number of License Classes

We understand how six classes of operator licenses in the amateur radio service place an administrative burden on the Commission and how they complicate the preparation and administration of examinations by Volunteer Examiners. In our opinion, fewer license classes would serve the amateur service equally well, if not better, and would be more in keeping with amateur licensing trends of many other countries. Some of our QCWA members recall the original amateur licensing structure prescribed by the Navy Department and the Federal Radio Commission. Two and subsequently three classes of licenses provided the amateur service with adequate rules and regulations for several decades. During this period amateur radio expanded and provided many of the technically proficient wireless operators required by the government when it became involved in World War II.

Our recommendation is that the present six amateur service operator licenses be reduced from six to three. These three classifications should be identified as Technician, General and Extra. Our recommendation differs with the proposed Commission restructure in that we believe the Advanced Class would be irrelevant if the code proficiency recommendations we propose are adopted. Accordingly, we recommend that present Advanced Class licenses be grandfathered into the Extra Class.

Subsequent applicants for the Extra Class should be required to pass examination on the present Elements 4(A) and 4(B) or a new element combining the essence of the two. The present Novice Class should be phased out as proposed in the FCC Docket. Present holders of this class should be grandfathered into the General Class as the Commission and the ARRL propose.

We also agree that the present Technician Plus Class be phased out. The holders of this class who were licensed before March 21, 1987 should be grandfathered into the General Class. Technician licenses issued on or after March 21, 1987 should remain as Technicians. To qualify for the General Class, these operators would only have to pass Element 3(B) provided our code proficiency recommendations are adopted.

B. Greater Volunteer Examiner Opportunities

The consolidation of the present Advanced and Extra Class licenses and the reduction in code proficiency we are recommending would significantly expand volunteer examiner participation. We agree with the Commission, that under the proposed restructuring, General Class operators should be eligible to serve as Volunteer Examiners for Technician Class applicants.

C. Races Station Licenses

We agree with the Commission proposal to delete RACES licenses.

D. Privatization of Certain Enforcement Procedures

We agree with the involvement of the Amateur Auxiliary in policing improper radio transmissions, noting that self-policing is a well-known purpose and objective of radio amateurs. We defer to the ARRL concerning proposed solutions other than the one offered in RM-9150.

E. Telegraph Examination Requirements

The discussion of Morse code telegraphy in Paragraphs E. 20 and 21 is, in our judgement, an accurate assessment of the past and future importance of code proficiency in amateur and maritime wireless communications.

We do not believe that three levels of 5, 13 and 20 wpm code proficiency remain relevant in today's communication practices. We recommend that only two code proficiency speeds be required: 5 and 12 wpm. To replace the higher code speed requirements and to ensure proficiency in all modes available, examination element questions should be added.

We also recommend that Volunteer Examiners require one minute of perfect copy of the five-minute test and eliminate multiple choice or fill-in type answers.

Our recommendations for code speed proficiency for amateur licenses are 5 wpm for the Technician and General Classes and 12 wpm for the Extra Class

We are not in complete agreement with either the ARRL proposal in RM-9196 or the conclusions of the Commission with respect to higher code speed examination of applicants with disabilities. We believe an applicant with a disability who feels he or she requires special consideration by examiners should provide evidence in letter form delineating this disability before the examination is taken. This should not be an undue burden on the applicant as it would be unusual for his or her physician or practitioner to be unfamiliar with the disability.

F. Written Examinations

We believe that the present general topic area for written examination in the Commissions Rules are adequate with the exception of advanced technologies. We recommend that these be included in future examinations.

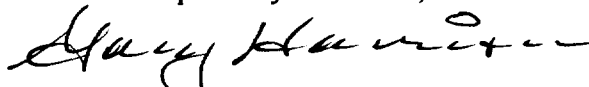
We also believe that the present method of providing prepared and published examination questions does not necessarily indicate proficiency or technical knowledge of applicants. Although more technical proficiency of examiners might be required, we recommend some essay type responses by applicants and that the minimum passing score of 80 be required. This should provide more meaningful and better measures of the technical and regulatory proficiency of applicants.

Conclusion

We offer no changes to the **ORDERING CLAUSES** and **APPENDIX** to Docket No. 98-143 other than those which may require appropriate revision by the Commission as a result of our recommendations.

The QCWA Board of Directors appreciates the opportunity to offer comments and recommendations concerning this Docket and requests they be considered for adoption by the Commission as the Amateur Service Rules and Regulations are revised.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Gary Harrison".

Gary Harrison, K0BC
President